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*Attorneys for Defendant: Otto Trucking LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto  
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANT OTTO TRUCKING'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF ITS  
OPPOSITION TO MOTIONS TO QUASH  
AND EXHIBITS**

Courtroom: F-15<sup>th</sup> Floor  
Magistrate Judge: Hon. Jacqueline Scott Corley  
Trial: October 10, 2017

Filed/Lodged Concurrently with:

1. Declaration of James Lin
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto Trucking”) submits this motion for an order to file under seal its Response to Plaintiff Waymo’s Motion to Quash and Non-Party Keker Van Nest & Peters LLP’s Motion to Quash (the “Response”). Specifically, Otto Trucking requests an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Designating Party
Letter Brief re Opposition to Motion to Quash	Highlighted Portions	Plaintiff
Exhibit 3 to Declaration of Hayes Hyde – Excerpts from the transcript of the 30(b)(6) Deposition of Gary Brown, dated August 8, 2017.	Highlighted Portions	Plaintiff
Exhibit 4 to Declaration of Hayes Hyde – Bates-stamped WAYMO-UBER-00012097.	Entire Document	Plaintiff
Exhibit 5 to Declaration of Hayes Hyde – Bates-stamped WAYMO-UBER-00084602 – 00084608.	Entire Document	Plaintiff
Exhibit 6 to Declaration of Hayes Hyde – Bates-stamped WAYMO-UBER- 00083677 – 00083683.	Entire Document	Plaintiff
Exhibit 7 to Declaration of Hayes Hyde – Bates-stamped WAYMO-UBER- 00084565 – 00084570.	Entire Document	Plaintiff
Exhibit 8 to Declaration of Hayes Hyde – Bates-stamped WAYMO-UBER-00084551 – 00084555.	Entire Document	Plaintiff
Exhibit 9 to Declaration of Hayes Hyde – Bates-stamped WAYMO-UBER-00084492 – 00084505.	Entire Document	Plaintiff
Exhibit 10 to Declaration of Hayes Hyde – Bates-stamped WAYMO-UBER-00084484 – 00084491.	Entire Document	Plaintiff
Exhibit 11 to Declaration of Hayes Hyde – Bates-stamped WAYMO-UBER-00084520 – 00084521.	Entire Document	Plaintiff
Exhibit 12 to Declaration of Hayes Hyde – Excerpts from the transcript	Highlighted Portions	Plaintiff

of the Deposition of Kristinn Gudjonsson, dated July 28, 2017.		
Exhibit 13 to Declaration of Hayes Hyde – Excerpts from the transcript of the Deposition of Sasha Zbrozek, dated August 18, 2017.	Entire Document	Plaintiff
Exhibit 14 to Declaration of Hayes Hyde – Bates-stamped WAYMO-UBER-00083653-00083655.	Entire Document	Plaintiff

The highlighted portions of the Letter Brief, the highlighted portions of Exhibits 3 and 12 to the Declaration of Hayes Hyde, and the entirety of Exhibits 4, 5, 6, 7, 8, 9, 10, 11, 13, and 14 to the Declaration of Hayes Hyde contain information that Waymo has designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no position about whether the confidentiality designations are appropriate. Otto Trucking anticipates that Waymo will file any necessary declarations to seal the above information pursuant to Local Rule 79-5.

Otto Trucking’s request to seal is narrowly tailored to those portions of the Response and its supporting documents that merit provisional sealing.

Dated: August 27, 2017

Respectfully submitted,

By: /s/ James Lin

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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **August 27, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **August 27, 2017**.

/s/ James Lin  
JAMES LIN